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 Brendan O'Shea, and Danny O'Shea*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

HARPO, INC. and OW LICENSING
 COMPANY, LLC,

Plaintiffs,

v.

NUU3 NUTRITION LLC, BRENDAN
 O'SHEA, and DANNY O'SHEA,

Defendants.

Case No. 2:23-cv-00899-JCM-VCF

**STIPULATION AND ORDER FOR
 EXTENSION OF TIME TO ANSWER OR
 OTHERWISE RESPOND TO
 COMPLAINT**

(Sixth Request)

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1, Plaintiffs Harpo, Inc. and OW Licensing Company, LLC ("Plaintiffs"), by and through their counsel of record, and Defendants NuU3 Nutrition LLC, Brendan O'Shea, and Danny O'Shea ("Defendants"), by and through their counsel of record, hereby agree and stipulate to an extension of time to February 15, 2024, for the Defendants to file and serve their answer or otherwise respond to the Complaint (ECF No. 1).

Defendant NuU3 Nutrition LLC was served on July 12, 2023. On August 1, 2023, the parties filed a stipulation to extend NuU3 Nutrition LLC's deadline to answer or otherwise respond to the Complaint to September 1, 2023 (ECF No. 20), which was granted by the Court on August 3, 2023 (ECF No. 21).

Defendant Brendan O'Shea was served on July 22, 2023. On August 14, 2023, the parties filed a stipulation to extend Brendan O'Shea's deadline to answer or otherwise respond to the Complaint to September 1, 2023 (ECF No. 23), which was granted by the Court on August 14, 2023 (ECF No. 24).

1 Defendant Danny O'Shea was served on August 9, 2023.

2 On August 24, 2023, the parties filed a stipulation to extend the deadline for all Defendants
3 to answer or otherwise respond to the Complaint to October 2, 2023 (ECF No. 26), which was
4 granted by the Court on September 5, 2023 (ECF No. 28).

5 On September 25, 2023, the parties filed a stipulation to extend the deadline for all
6 Defendants to answer or otherwise respond to the Complaint to November 1, 2023 (ECF No. 29),
7 which was granted by the Court on September 25, 2023 (ECF No. 30).

8 On October 23, 2023, the parties filed a stipulation to extend the deadline for all Defendants
9 to answer or otherwise respond to the Complaint to December 1, 2023 (ECF No. 31), which was
10 granted by the Court on October 25, 2023 (ECF No. 32).

11 On November 27, 2023, the parties filed a stipulation to extend the deadline for all
12 Defendants to answer or otherwise respond to the Complaint to January 15, 2024 (ECF No. 33),
13 which was granted by the Court on November 28, 2023 (ECF No. 34).

14 The parties now agree that the Defendants shall have up to and including February 15,
15 2024, to answer or otherwise respond to the Complaint (ECF No. 1). This is the sixth request by
16 the Defendants Nu3 Nutrition LLC and Brendan O'Shea and the fifth request by Defendant
17 Danny O'Shea.

18 Good cause for this request exists because counsel for Plaintiffs and Defendants remain
19 actively engaged in good faith settlement discussions in order to try and resolve this matter.
20 Plaintiffs presented a settlement proposal in the form of a draft written settlement agreement to
21 Defendants on November 6, 2023. On Friday, November 8, 2023, counsel for the parties discussed
22 the settlement proposal and discussed early production by both sides of backup information
23 supporting each side's respective settlement positions. Both sides have exchanged information
24 and have engaged in continued dialogue regarding possible terms of settlement based on the shared
25 information. As such, the parties require additional time to continue such settlement efforts and
26 to work out the possible terms and conditions of a settlement.

27 Accordingly, this Stipulation is made for good cause and not for purposes of delay.
28

For the foregoing reasons, the parties hereby stipulate and agree to extend the deadline for Defendants to answer or otherwise respond to the Complaint to February 15, 2024.

DATED: January 5, 2024

IT IS SO AGREED AND STIPULATED:

LEWIS ROCA ROTHGERBER CHRISTIE LLP GILE LAW GROUP LTD.

/s/ Meng Zhong

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IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 1-9-2024

CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/ECF to all participants in the case who are registered CM/ECF users.

/s/ Ryan Gile
Employee, Gile Law Group Ltd.